



WASTEWATER SERVICES

September 10, 2015

Ms. Becky L France
Environmental Engineer Senior
Virginia Department of Environmental Quality
3019 Peters Creek Road
Roanoke, VA 24019

Re: PCBs Monitoring Waiver Request for WVWA Glen Wilton Wastewater Treatment Plant; VPDES Permit No. VA0089273

Dear Ms. France:

This letter serves as a request for a waiver for the PCB monitoring requirements for the reissued Virginia Pollutant Discharge Elimination System (VPDES) permit for the Western Virginia Water Authority (WVWA) Glen Wilton Wastewater Treatment Plant (WWTP). This waiver request is submitted in accordance with the Virginia Department of Environmental Quality (DEQ) *TMDL Guidance Memo GM09-2001 Guidance for monitoring of point sources for TMDL development using low-level PCB method 1668* which stipulates that exemptions from PCB monitoring may include minor municipal facilities provided that:

The permittee shall provide adequate documentation that the facility is not a potential source of PCBs. This is based on a certified report by the owner and may include site inspection by DEQ staff.

This request provides the facility background and other information supporting our belief that this wastewater treatment plant does not represent a source of PCBs beyond background levels and as such should not be required to conduct the PCB monitoring.

As you know, the Glen Wilton WWTP is a relatively new facility that started operation in 1997, well after the production of PCBs was banned in the United States. The facilities are modern and the current design flow is 20,000 gallons per day (gpd). Current flows average around 4,000 gpd. No chemicals are stored on site and no PCB-containing chemicals are used at this site. The WWTP facilities and operations are not expected to contain or generate PCBs beyond background levels.

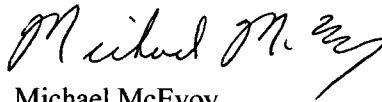
The collection system is relatively small and the system only serves residential users and a small church. There are no commercial establishments served by the system. The service area does not now or in the past include areas influenced by industry or manufacturing facilities that could have used or released PCBs to the surrounding environment. As such, the collection system is not expected to have been impacted by historical PCB uses or be a source of PCBs.

In recognition of the fact that the wastewater treatment plant, the wastewater collection system, and the wastewater sources served by this facility have no reasonable expectation to contain or generate PCBs at concentrations greater than background levels, I request that the requirement for conducting low-level PCB monitoring be waived for this facility.

As always, please do not hesitate to contact Scott Shirley at (540) 853-1283 or Lawrence Hoffman at (540) 552-5548 should you have any questions or require any additional information.

***Certification:** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Sincerely,



Michael McEvoy
Executive Director, Wastewater Services

MM/

cc: S. Scott Shirley, Director of Wastewater Operations
Marty Sensabaugh, Wastewater Operation Manager, Western Virginia Water Authority
Janis Richardson, Environmental Programs Coordinator, Western Virginia Water Authority
R. Lawrence Hoffman, Vice President, CHA Consulting, Inc.